

ILLINOIS STATE SENATE

SPRINGFIELD OFFICE
103D STATE CAPITOL
SPRINGFIELD, IL 62706
217/558-1006
FAX: 217/782-4079



DISTRICT OFFICES
510 S. STALEY RD.
SUITE D
CHAMPAIGN, IL 61822
217/607-1853
FAX: 217/607-5471

5130 HICKORY POINT FRONTAGE RD.
SUITE 103
DECATUR, IL 62526
217/330-9356
FAX: 217/330-9357

February 21, 2014

CHAPIN ROSE
SENATOR • 51ST DISTRICT

USEPA Region 5
Ralph Metcalfe Federal Building
77 West Jackson Blvd.
Chicago, IL 60604

Dear Sir or Madam,

Over the past year, the Mahomet Aquifer Working Group has been working on ensuring that the aquifer remains safe from possible contamination. Legislators, state agency representatives, local officials, and action groups have been working together on issues related to the aquifer and, in particular, the proposed storage of polychlorinated biophenyls (PCBs) at the Clinton Landfill. This group was created in response to the current application before the United States Environmental Protection Agency (US EPA) for acceptance of PCB's at the Clinton site.

At our last meeting, we learned of serious concerns that need to be brought to your attention and that of the US EPA because, apparently, the state EPA and US EPA lack a very important safeguard: duplicate dissemination of information between them. This issue of "information sharing" came up in reference to recent routine ground water monitoring well testing sample data submitted by the landfill to the state EPA, the results of which are, apparently, not forwarded to the US EPA. The importance of this missing information cannot be understated - as the US EPA is being asked to render a decision on the permit - without the aid of vital information necessary to its decision making process.

The problem is not limited to just this testing data issue which I will elaborate on in greater detail shortly. Even routine matters that are, frankly, predicates to the US EPA granting any permit, are not being shared. For example, it has come to my attention that the US EPA may not be aware that the Dewitt County Board has now officially voted to require a new siting hearing. The official county resolution is attached. The issue of local siting approval is a predicate matter that the US EPA cannot ignore.

Moreover, as mentioned above, recent ground water monitoring results have called into question the very structural integrity of the proposed site itself. In recent inspection data (copies of which are attached), there are serious concerns that the existing landfill is already compromised and leaking because, among other compounds, both Dichloroethene (DCE) and Trichloroethene (TCE) have been detected.

Officials from the Illinois State Water Survey (who are members of our working group) noted that both DCE and TCE are seriously dangerous chemicals that do not occur naturally in the soil and shallow sands where these samples were taken. At this point, no one has identified the source of the DCE, TCE, or any of the other chemical exceedances in the landfill's ground water monitoring well testing. Their presence is not only dangerous, but begs the questions of whether the facility has already been structurally compromised with leachate flowing into the groundwater.

The proposed site's structural soundness should be another predicate question for the US EPA. The fact that such dangerous chemicals have been found directly underneath the existing structure, should warrant rejection of the permit as there is absolutely no assurance that the facility is containing what is currently in it – let alone its ability to contain what might come should the permit be issued. Quite the contrary, the data indicates that the Clinton Landfill may already be compromised.

I have enclosed the most recent documents from our Working Group that include the data points I have referenced. Again, it came as a complete surprise that, apparently, the US EPA is not receiving this same information already. I would hope that the US EPA would find this lack of information sharing as disturbing as several members of our group did and reach out to the state EPA for additional documents and information as may be required to protect our water supply.

The Working Group hopes to keep both the public and our public officials as informed as possible. The group will continue to meet to guarantee the safety of our precious water supply.

Best Regards,

A handwritten signature in black ink that reads "Chapin Rose". The signature is written in a cursive, flowing style with a large initial "C".

Chapin Rose
State Senator

TABLE 1 (cont'd)
Clinton Landfill No. 3
Summary of Confirmation Sample Results – 2nd Quarter 2013

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Resample?
R17R [#]	Nitrate-N, Dissolved	mg/L	13	0.06	0.04
R17R [#]	Specific Conductance, Field Measured	µmhos/cm	1640	1281	1550
UPPER RADNOR TILL SAND WELLS					
G49S	Nitrate-N, Dissolved	mg/L	0.68	0.29	0.15
G50S	Arsenic, Dissolved	µg/L	18	125.4	53
LOWER RADNOR TILL SAND WELLS					
G01M [#]	Sulfate, Dissolved	mg/L	100	65	160
G05M [#]	Bromomethane	µg/L	5.4	2	<1
G05M [#]	Chloromethane	µg/L	2.2	2	<1
G08M [#]	Nitrate-N, Dissolved	mg/L	0.42	0.14	<0.02
G16M	Nitrate-N, Dissolved	mg/L	12	0.14	3.8
G25M	cis-1,2-Dichloroethene	µg/L	2.2	1	<1
G25M	Trichloroethene	µg/L	1.2	1	<1
G26M	pH, Field Measured	s.u.	8.06	5.79 - 7.97	7.39
G39M	Nitrate-N, Dissolved	mg/L	14	0.14	0.07
G47M	Boron, Dissolved	µg/L	630	622	720
G47M	Magnesium, Dissolved	mg/L	89	82.2	85
G48M	Chromium, Dissolved	µg/L	5.2	4.6	<4
G48M	Lead, Dissolved	µg/L	2.1	1	<1
G49M	Specific Conductance, Field Measured	µmhos/cm	1470	1457	1410
R17M	Specific Conductance, Field Measured	µmhos/cm	1620	1457	1470
ORGANIC SOILS WELLS					
G03D [#]	Specific Conductance, Field Measured	µmhos/cm	1994	1383	1030
G06D [#]	Magnesium, Dissolved	mg/L	73	72.1	64
G09D	Nitrate-N, Dissolved	mg/L	2.8	1.5	<0.02
G09D	Sulfate, Dissolved	mg/L	150	76	160
G16D	Nitrate-N, Dissolved	mg/L	6.3	1.5	<0.02
G25D	cis-1,2-Dichloroethene	µg/L	3.7	1	<1
G25D	Trichloroethene	µg/L	2	1	<1
G26D	cis-1,2-Dichloroethene	µg/L	1.3	1	<1

Notes:

1. [#]Upgradient Well
2. AGQS: Applicable Groundwater Quality Standard/MAPC: Maximum Allowable Predicted Concentration
3. dissolved = filtered sample, total = unfiltered sample
4. mg/l = Milligrams per liter = parts per million (ppm), µg/L = Micrograms per liter = parts per billion (ppb), µmhos/cm = micromhos/centimeter, s.u. = standard units.
5. NE = Not Established
6. < = Not detected above the laboratory reporting limit
7. Resample results displayed in **BOLD** exceeded the established interwell AGQS/MAPC value.

RESOLUTION NO. 2013--

A resolution requesting and directing Dewitt County States Attorney to prepare and file, correspondence on behalf of the Dewitt County Board, to the Illinois Pollution Control Board (IPCB) declaring that the Dewitt County Board has an interest in the outcome of IPCB case no. 2013-022: and Requesting that 39.2 of the Il Environmental Protection act be fully enforced by the IPCB according to its terms: and declaring to the IPCB that the Dewitt County Board believes the new Chemical Waste Unit at issue requires siting authority from the Dewitt County Board, pursuant to 415 ILCS 5/39.2.

WHEREAS, the Dewitt County Board has concerns regarding Clinton Landfill #3: and

WHEREAS, the Dewitt County Board deems it in the best interests of the County and the health, safety and welfare of its citizens to send correspondence to the clerk of the IPCB in case no. 2013-022. expressing the County Board's concerns.

NOW THEREFORE, BE IT RESOLVED BY THE DEWITT COUNTY BOARD, OF DEWITT COUNTY, that:

- A. The Dewitt County States Attorney is requested and directed to prepare and file forthwith correspondence on behalf of the Dewitt County Board in IPCB case no 2013-022 addressed to: John Therriault, clerk, Illinois Pollution Control Board, 100 West Randolph Street, James R Thompson Center, Suite 11-500, Chicago, IL 60601-3218 and
- B. Acknowledging that the Dewitt County Board has a duty to take and order suitable and proper measures for the protection of the Dewitt County Board, Dewitt County and its citizens in the IPCB case no 2013-022: and

- C. Declaring that the Dewitt County Board has an interest that may be affected by a decision of the IPCB case no. 2013-022; and
- D. Requesting that section 39.2 of the Il Environmental Protection act (415 ILCS 5/39.2) be fully enforced by the IPCB according to its terms, no more and no less; and
- E. Declaring to the IPCB that the Dewitt County Board believes the new Chemical Waste Unit at issue in the IPCB case no 2013-022 requires local siting authority from the Dewitt County Board pursuant to 415 ILCS 5 /39.2.

Be it further resolved that the County Boards Attorney is requested and directed to take such further action as may be necessary to effectuate this resolution.

Pursuant to vote of the members of the Dewitt County Board the vote for passage of this resolution is as follows:

By ayes and Naves

Ballenger	<u>NO</u>	Pruser	<u>NO</u>
Brown	<u>yes</u>	Redman	<u>NO</u>
Daugherty	<u>yes</u>	Savage	<u>yes</u>
Hoffman	<u>yes</u>	Tucker	<u>yes</u>
Koons	<u>yes</u>	Whitted	<u>NO</u>
Newburg	<u>NO</u>	Wissmiller	<u>yes</u>

The voting being 7 Ayes and 5 Naves and the vote having met the required majority of the county board members holding office is declared passed this 14th day of November, 2013



Sherrie Brown, County Board Chairperson

ATTEST:



Dana Smith, County Clerk